

CALFRESH (CF) PROGRAM REQUEST FOR POLICY/REGULATION INTERPRETATION

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:	5. DATE OF REQUEST: 8/21/17	NEED RESPONSE BY: 9/5/17
2. REQUESTOR NAME:	6. COUNTY/ORGANIZATION: Riverside County	
3. PHONE NO.:	7. SUBJECT: Electronic Signatures	
4. REGULATION CITE(S): 63-300.321	8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). ACL 17-57, 16-59	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

Questions are in regards to ACL 17-57

1) Page 3 states, "Ensure an adult member of the CalFresh household or Authorized Representative takes and affirmative action to indicate concurrence." Does this mean that minor applicants cannot e-sign a document?

2) Page 4 states, "promptly provide a written copy of the information given over the phone, along with simple instructions for correcting errors or omissions." Does this provision fall under the waiver described in ACL 16-59? If so, do we only provide simple instructions when a copy is requested by the household?

10. REQUESTOR'S PROPOSED ANSWER:

1) Minor applicants are allowed to e-sign documents as per MPP 63-300.32, "Applications contain the penalty of perjury statement and must be signed by one adult household member or authorized representative or a responsible minor when the applicant household is composed entirely of minors and has no adult to act on its behalf."

2) The instruction to provide a written copy of the information given over the phone is covered in the waiver in ACL 16-59. Instead, counties provide copies of information upon request. When copies of information upon request is provided to the customer, then simple instructions for correcting errors or omissions are provided.

11. STATE POLICY RESPONSE (CFPB USE ONLY):

CDSS concurs with the county's proposed answer to question #1, however, it disagrees with the proposed answer to question #2. Waiver #2160023 which is covered in ACL 16-59 specifically refers to online applications: "The State agency will allow individuals who complete an online application at their local office to print their application information for their records, upon request." Telephonic signature is the same as any other signature which would be required on an application and should be treated as such. Per ACIN I-16-30: "All current CDSS Manual of Policies and Procedures (MPP) requirements remain in effect. No regulatory requirements have changed due to the use of telephonic signatures..."

FOR CDSS USE

DATE RECEIVED: August 23, 2017	DATE RESPONDED TO COUNTY/ALJ: August 25, 2017 (WEB)
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